

1 FERNANDO HARO III
2 P.O. BOX 81972
3 LAS VEGAS, NV 89180
(702) 918-1910
fernando.haro.iii@gmail.com

4 PROPER PERSON
5

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 FERNANDO HARO III, an individual;

9 Plaintiff,

10 vs.

11 KRM, INC. d.b.a. "THOMAS KELLER
12 RESTAURANT GROUP", a foreign
13 corporation; and KVP, LP d.b.a. "BOUCHON
14 AT THE VENETIAN," a foreign Limited
Liability Company;

15 Defendants.

CASE NO.: 2:20-cv-02113-APG-DJA

STIPULATION AND ORDER TO
EXTEND TIME TO FILE OPPOSITION
TO MOTIONS TO DISMISS

16
17 *Pro se* Plaintiff Fernando Haro III ("Plaintiff") and Defendants KRM, Inc, d.b.a. Thomas
18 Keller Restaurant Group and KVP, LP d.b.a. Bouchon Restaurant (collectively, "Defendants"),
19 by and through their attorneys, hereby stipulate and agree as follows:

20 1. Plaintiff filed his Complaint on November 16, 2020.

21 2. Plaintiff filed his First Amended Complaint on February 21, 2021.

22 3. Pursuant to Court Order [ECF No. 17], Defendants deadline to file their responses
23 to Plaintiff's First Amended Complaint was June 21, 2021.

24 4. On June 21, 2021, the parties filed a stipulation to extend Defendants deadline to
25 file their responses to July 2, 2021, which the Court granted. ECF Nos. 18 & 19.

26 5. On June 30, 2021, Plaintiff filed a Second Amended Complaint. ECF No. 22.

1 6. On July 2, 2021, Defendants filed their respective Special Motions to Dismiss
2 Plaintiff's Second Amended Complaint ("Motions"). ECF Nos. 26 & 27.

3 7. Plaintiff's deadline to respond to Defendants' Motions is July 19, 2021.

4 8. Plaintiff avers that he needs additional time to locate, organize, and review
5 relevant documents and prepare the appropriate responses. Plaintiff requests additional time to
6 file his two responses up to and including August 27, 2021.

7 9. There are currently no scheduled hearings in this case. Plaintiff's sought
8 extension will not unduly delay the proceedings.

9 10. Defendants do not oppose Plaintiff's requested extension.

10 11. Accordingly, Plaintiff shall have until August 27, 2021, to file responses to
12 Defendants Motions.

13 12. This stipulation is not made for purposes of delay.

14 **IT IS SO STIPULATED.**

15 DATED this 16th day of July 2021

16 DATED this 16th day of July 2021

17 **GORDON REES SCULLY**
18 **MANSUKHANI**

19 **FERNANDO HARO III**

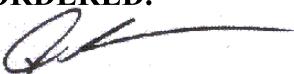
20 */s/ Dione C. Wrenn*

21 */s/ Fernando Haro*

22 DIONE C. WRENN, ESQ.
23 Nevada Bar No. 13285
24 300 South 4th Street, Suite 1550
25 Las Vegas, Nevada 89101
26 *Attorneys for Defendants*

27 FERNANDO HARO III
28 P.O. Box 81972
29 Las Vegas, NV 89180
30 *Plaintiff in Proper Person*

31 **IT IS SO ORDERED.**

32 
33 _____
34 UNITED STATES DISTRICT JUDGE

35 July 23, 2021

36 _____
37 **DATED**